

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Chapter 11
	)	
CELSIUS NETWORK LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 22-10964 (MG)
	)	
	Debtors.	) (Jointly Administered)
	)	
DANIEL FRISHBERG,	)	
	)	
	Plaintiff,	) Adversary Proceeding No. 22-01179 (MG)
v.	)	
	)	
CELSIUS NETWORK LLC;	)	
CELSIUS KEYFI LLC;	)	
CELSIUS LENDING LLC;	)	
CELSIUS MINING LLC;	)	
CELSIUS NETWORK INC.;	)	
CELSIUS NETWORK LIMITED;	)	
CELSIUS NETWORKS LENDING LLC;	)	
and CELSIUS US HOLDING LLC,	)	
	)	
	Defendants.	)
	)	

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**JOINT STIPULATION AND AGREED ORDER BY AND AMONG THE  
DEBTORS AND DANIEL FRISHBERG REGARDING DEBTORS' TIME TO RESPOND  
TO MR. FRISHBERG'S COMPLAINT**

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This Joint Stipulation and Agreed Order (this “Stipulation”) is made and entered into by and among: (a) Celsius Network LLC, and certain of its subsidiaries and affiliates, as debtors in possession in the above-captioned chapter 11 cases (the “Debtors”); and (b) Daniel Frishberg, a

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

*pro se* litigator (together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

**RECITALS**

**WHEREAS**, on December 9, 2022, Mr. Frishberg filed his *Complaint against Celsius Network LLC, Celsius Keyfi LLC, Celsius Mining LLC, Celsius Network Inc., Celsius Network Limited, Celsius Networks Lending LLC, Celsius US Holding LLC* [Docket No. 1652] (the “Adversary Complaint”);

**WHEREAS**, Mr. Frishberg intends to amend his Adversary Complaint (the “Amended Adversary Complaint”);

**WHEREAS**, the Parties met and conferred and have agreed to stipulate to staying certain responsive deadlines in this case. The Parties agree to extend the deadline for the Debtors to file any responsive pleading to the Amended Adversary Complaint and the deadline for Mr. Frishberg to file any subsequent reply.

**NOW, THEREFORE, IT IS STIPULATED AND AGREED AND, UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:**

1. The foregoing recitals are incorporated herein by reference.
2. The Parties agree that the Debtors’ deadline to respond to the forthcoming Amended Adversary Complaint is extended to 45 days following the filing of the Amended Adversary Complaint.
3. The Parties agree that Mr. Frishberg’s deadline to reply to any responsive pleading filed by the Debtors is extended to 45 days following the filing of such responsive pleading.

**IT IS SO ORDERED.**

New York, New York  
Dated: \_\_\_\_\_, 2023

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THE HONORABLE MARTIN GLENN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO THIS 31st DAY OF JANUARY, 2023:

Washington, D.C.

Dated: January 31, 2023

*/s/ Ross M. Kwasteniet, P.C.*

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Debtors in Possession*



Daniel Frishberg

*Pro Se Litigant*

(It is really hard to use a mouse to digitally sign something)